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REMARKS

The Examiner's Office Action of 06/12/2006 has been reviewed. Note is taken that Claim 1 and 10 have been allowed.

The Examiner has rejected Claim 7 because of improper numbering, in that two consecutive claims were numbered as Claim 7. Applicant has amended the numbering of the second Claim 7 to Claim 15.

35 U.S.C. §102(b)

The Examiner has rejected Claims 2, 3, 5, 6, 7 (second, now claim 15) 11 and 12 under 35 U.S.C. \$102(b) as being anticipated by Curtis (U.S. Patent 5,509,572).

The Applicant has amended Claim 2 to include the limitations of "a pair of trolley rails comprising trolley rail locations" and "an indicia reader" and "indicia being attached to a garment and indicia being associated with specific trolley rail locations with the indicia being readable by the indicia reader." Curtis only teaches an indicia attached to a rail. The present system allows the system to move a garment by recording the indicia attached to the garment and re-assigning a new location indicia to that garment. This is an improvement of, and a departure from, the teachings of the Curtis patent.

Claims 3, 5, and 6 are each dependent upon independent
Claim 2. The amendment to Claim 2, having the additional novel
limitation not taught by Curtis, also applies to Claims 3, 5,

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and 6. Claim 15 (old Claim 7, second renumbered) contains the limitations of Claim 7. The amendment to Claim 2, therefore, also applies to Claim 15, which is dependent upon Claim 2, and removes it from the teachings of Curtis.

Claims 11 and 12 are not dependent upon Claim 2. Claim 11, the independent claim has been amended to include the added limitations of "the trolley having a pair of associated rails with the rails comprising trolley rail locations" and "an indicia reader" and "indicia being attached to a garment and indicia being associated with specific trolley rail locations, with the indicia being readable by the indicia reader. Claim 12, being dependent upon Claim 11, therefore, contains the same added limitations as set forth in Claim 11.

35 U.S.C. §103(a)

The Examiner had rejected Claims 4 and 8 under 35 U.S.C. \$103(a) as being unpatentable over Curtis (5,509,572) in view of Neef et al. (5,927,472). The Applicant has amended Claim 2, the independent claim upon which Claims 4 and 8 are dependent, to include the limitation of having an indicia attached to a garment. This use of indicia is not taught by either Curtis (who teaches indicia associated with a hanger slot) or Neef (who teaches indicia associated with a hanger) and the use of indicia attached to a garment is a departure from, and an improvement of, the prior art. The use of an indicia attached to a garment means

that if the garment is dropped from the hanger, or is being processed, there is always a way to identify an owner. In the prior art, in particular Curtis, with only the hanger slot being identified any movement of the hanger to another location would cause the system to fail. So to with Neef, if the garment is removed, or is dropped, from the hanger, the identity of the owner is lost, whereas with an indicia attached to the garment, neither of these system failures occur because the owner of the garment is always identifiable.

The Examiner has rejected Claim 14 under 35 U.S.C. 103(a) as being unpatentable over Curtis (5,590,572) in view of Butcher et al. (4,991,719). Claim 14 is dependent upon Claim 11 and the amendments to Claim 11 affect the scope of Claim 14. Claim 11 has been amended to include the limitations of the device having a "trolley having a pair of associated rails with the rails comprising trolley rail locations", "an indicia reader", and "indicia being attached to a garment and indicia being associated with specific trolley rail locations with the indicia being readable by the indicia reader."

Butcher and Curtis do not, either alone or in combination, teach these combined limitations. While Butcher does teach a system of numbering conveyor stations sequentially, the present application teaches the use of an indicia reader to read the location indicia. Butcher is silent as to how the location

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numbers are read, and one, by reading Butcher, assumes that the numbering is read using one's vision. Butcher does not describe his location numbering as being readable by an indicia reader, such as is commonly done using a bar code scanner. Curtis does not describe a garment number system, and such a limitation would not work with Curtis, as the indicia reader is configured to scan the trolley rail, and not the garments.

In practice, the present application allows a user to place garments within the system, and then perform various operations, such as cleaning and pressing on the garments. When the garments are placed back on the conveyor the location and garment indicia are then reconciled, allowing the garment to be placed anywhere in the system and still be locate-able. This is a departure and an unobvious improvement over the prior art. With this system garment inventory may be moved from one location to another, with the identification and the location continually stored and updated to accommodate the movement. This is not possible with any of the prior art cited thus far.

The Applicant submits that the foregoing is responsive to each and every one of the Examiner's rejections. The Applicant, therefore, respectfully requests that the Examiner withdraw all

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objections and rejections, and pass the application forward to issue.

Respectfully Submitted,

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